KATZMELINGER

370 LEXINGTON AVENUE, SUITE 1512 NEW YORK, NEW YORK 10017 www.katzmelinger.com

Katherine Morales Katz Melinger PLLC o: 212.460.0047 f: 212.428.6811 kymorales@katzmelinger.com

April 12, 2023

VIA ECF

Honorable Jesse M. Furman United States District Court Southern District of New York 40 Centre Street, Room 2202 Application GRANTED. The initial pretrial conference is hereby ADJOURNED to May 17, 2023, at 9:00 a.m. The Clerk of Court is directed to terminate ECF No. 41. SO ORDERED.

Re: Juan Collado et. al. v. Adolfo Meat Market Corp., et./al.

Civil Action No. 22-cv-09366-JMF

Your Honor:

We represent the Plaintiffs in the above-referenced matter, and we write jointly with counsel for Defendants to respectfully request (1) that the April 19, 2023 Initial Conference be adjourned to a date after the May 2, 2023 settlement conference in this matter; and (2) that Plaintiffs' time to reply or otherwise move with respect to Defendants' counterclaims be extended from April 19, 2023 to April 28, 2023. This is the parties' first request for an extension of the foregoing deadlines. Defendants consent to these requests.

As the Court is aware, this matter was referred to an early settlement conference. Dkt. No. 7, 37. On April 4, 2023, the parties contacted Magistrate Judge Willis' Chambers and based on Judge Willis' availability, the parties scheduled a settlement conference for May 2, 2023. Dkt. No. 39. The parties respectfully request that the April 19, 2023 Initial Conference be adjourned to a date after the May 2, 2023 settlement conference in order to enable the parties to focus their time and resources on the upcoming settlement conference as well as to allow the parties to complete the settlement process contemplated by the Court's order referring this matter to a settlement conference. The parties are available to attend an adjourned initial conference on the following dates: May 17, 2023 through May 19, 2023, May 23, 2023, and May 26, 2023.

Additionally, on March 29, 2023, Defendants filed an Answer with counterclaims against Plaintiffs. Dkt. No. 38. Plaintiffs' response to Defendants' counterclaims is currently due on April 19, 2023. In order to allow Plaintiffs sufficient time to investigate the counterclaims and adequately move with respect to the same, Plaintiffs request, with Defendants' consent, that their time to reply or otherwise move with respect to Defendants' counterclaims be extended to April 28, 2023.

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We thank the Court for its time and consideration.

Respectfully submitted, /s/ Katherine Morales Katherine Morales

Cc: All Counsel of Record (via ECF)